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March 2, 2026

Submitted via email: crbpost2026@usbr.gov

Bureau of Reclamation
Attn: BCOO-1000
P. O. Box 61470
Boulder City, NV 89006

Re: Comment Letter on Draft Environmental Impact Statement for Post-2026 Colorado River Operations

Dear Sir or Madam:

On behalf of Desert Water Agency (DWA), we appreciate the opportunity to provide comments on the Draft Environmental Impact Statement (DEIS) for Post-2026 Colorado River Operations prepared by the U.S. Bureau of Reclamation (Reclamation).

DWA is a public water agency serving Palm Springs and surrounding communities in the Coachella Valley. Although DWA is not a direct contractor for Colorado River water, we have an indirect but significant interest in the long-term management of the River. Through a long-standing exchange agreement with the Metropolitan Water District of Southern California (MWD), DWA exchanges State Water Project supplies on a gallon-for-gallon basis for Colorado River water. This arrangement is necessary as the State Water Project conveyance system does not extend to the Coachella Valley, whereas the Colorado River Aqueduct traverses our region, allowing imported Colorado River water to be delivered to DWA's groundwater replenishment facilities.

As a groundwater-reliant agency that uses imported Colorado River water for aquifer recharge, DWA has a strong interest in ensuring that post-2026 operational decisions protect both water supply reliability and water quality, including salinity management.

I. Salinity Impacts

A. DEIS Section 3.6.2 and Technical Appendix Section 6.2.7: Significance Determination

DWA appreciates the discussion of salinity evaluation methods in DEIS Section 3.6.2 and Technical Appendix (TA) Section 6.2.7. However, the DEIS does not clearly state what constitutes a "significant" salinity impact under the National Environmental Policy Act, nor does it explicitly conclude whether salinity impacts under each alternative would be significant.

Esther M. Saenz, General Manager | Best, Best & Krieger, General Counsel

While the analysis appears to suggest that salinity impacts may not be significant, the document stops short of making an expressed finding. For water agencies such as DWA, whose imported supplies are ultimately recharged into groundwater basins, clarity regarding salinity outcomes is critical.

DWA respectfully requests that the Final EIS:

1. Clearly state, for each alternative, whether salinity impacts would be considered significant
2. Identify the thresholds, criteria, or benchmarks used to determine significance
3. Provide a concise explanation of the reasoning supporting each determination

A clear significance finding will improve transparency, facilitate informed public review, and provide greater certainty for agencies that must plan for long-term water quality management.

B. Salinity Economic Impact Analysis and Baseline Comparison

The DEIS references salinity analysis relative to the criteria established by the Colorado River Salinity Control Forum (Forum). While comparison to Forum criteria is important, DWA believes that this approach alone does not fully evaluate the incremental salinity impacts attributable to each alternative.

We recommend that Reclamation incorporate use of the Salinity Economic Impact Model (SEIM) to assess the socioeconomic consequences of salinity under each alternative. This analysis should:

- Compare modeled salinity outcomes for each alternative against the Continued Current Strategies (CCS) Baseline scenario
- Quantify incremental economic impacts associated with changes in salinity relative to the CCS baseline
- Include appropriate cross-references within the salinity sections of the Technical Appendix to ensure transparency and accessibility of the analysis

For agencies such as DWA, increases in salinity translate directly into higher operational costs, potential long-term impacts to groundwater quality, and the possible need for treatment at the wellhead to address elevated total dissolved solids (TDS). Evaluating salinity impacts only against Forum criteria, without comparison to the CCS baseline, does not fully illuminate the economic and operational consequences for downstream water users.

II. Importance of Ongoing Salinity Control Programs

DWA supports continued federal investment in and operation of Colorado River salinity control measures, including the Paradox Valley Unit, which plays a vital role in intercepting and removing naturally occurring saline brine before it enters the mainstem of the Colorado River and flows downstream to Lower Basin users.

Maintaining and enhancing salinity control efforts is essential to protecting water quality for agencies that rely on Colorado River imports for groundwater recharge. Without effective upstream salinity mitigation, increased salinity loads could result in higher TDS concentrations in delivered supplies, compounding long-term basin management challenges, and increasing costs for local ratepayers.

DWA urges Reclamation to ensure that the Final EIS:

- Clearly evaluate how each operational alternative may affect salinity loading over time,
- Recognize the continued importance of federal salinity control programs in mitigating those impacts; and
- Support sustained funding and operational reliability for facilities, such as the Paradox Valley Unit.

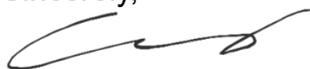
III. Conclusion

Desert Water Agency recognizes the complexity and importance of establishing a durable, equitable framework for post-2026 Colorado River operations. Although DWA is not a direct Colorado River contractor, our exchange agreement with MWD and our reliance on Colorado River water for groundwater replenishment create a meaningful and lasting connection to the River's management.

DWA respectfully requests that the Final EIS provide clearer findings regarding salinity significance, incorporate a robust economic impact analysis using appropriate modeling tools, and affirm the critical role of salinity control infrastructure in protecting downstream water quality.

Thank you for the opportunity to comment on this important effort. DWA looks forward to continued engagement as Reclamation advances the development of post-2026 operating guidelines.

Sincerely,



Esther M. Saenz
General Manager